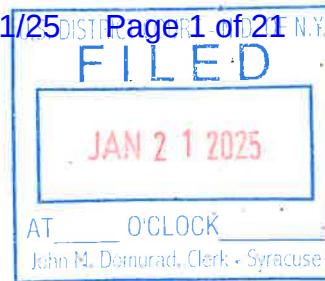


UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

Civil Case No.: 5:25-cv-95 (BKS/MJK)

Mr. Ryan D. Madore, On behalf of children, Plaintiff(s)  
 [REDACTED] vs. [REDACTED]  
 New York State's, Onondaga County, Family Court, [REDACTED]  
 Appointed Attorney Referee, Salvatore A. Pavone, Esq., Defendant(s)  
 Co-Conspirator(s) David M. Pavone, Esq.  
 Hon. Christina L. DeJoseph

Plaintiff(s) demand(s) a trial by:  JURY  COURT (Select **only** one).

Plaintiff(s) in the above-captioned action, allege(s) as follows:

## JURISDICTION

1. This is a civil action seeking relief and/or damages to defend and protect the rights guaranteed by the Constitution of the United States. This action is brought pursuant to 42 U.S.C. § 1983. The Court has jurisdiction over this action pursuant to 28 U.S.C. §§ 1331, 1333(3) and (4) and 2201.

## PARTIES

2. Plaintiff: Ryan David Madore, on behalf of biological Son's  
 Address: 5100 Highbridge St Apt 308  
Fayetteville, New York 13066  
315-518-7042

Additional Plaintiffs may be added on a separate sheet of paper.

3. a. Defendant: Salvatore A. Pavone, Esq.  
 New York State's, Onondaga County, Family Court,  
 Official Position: Appointed Attorney Referee  
 Address: 401 Montgomery St  
Syracuse, New York 13202

b. Defendant: David M. Primo, Esq.  
New York State's, Onondaga County, Family Court,  
Official Position: Chief Clerk

Address: 401 Montgomery St  
Syracuse, New York 13202

c. Defendant: Hon. Christina F. De Joseph  
New York State's, Onondaga County, Family Court,  
Official Position: Judge

Address: 401 Montgomery St  
Syracuse, New York 13202

Additional Defendants may be added on a separate sheet of paper.

4.

#### FACTS

Set forth the facts of your case which substantiate your claim of violation of your civil and/or Constitutional rights. List the events in the order they happened, naming defendants involved, dates and places.

**Note: You must include allegations of wrongful conduct as to EACH and EVERY defendant in your complaint. (You may use additional sheets as necessary).**

Facts of the case have been included  
which Substantiate my claim of violation  
of my civil and/or Constitutional rights.  
Listing the events in order they happened, naming  
defendants involved, dates and places.  
Using additional Sheets provided as was necessary.  
Please read attached additional Sheets. Thank you.

Facts of the Case:

Who, while acting in their official capacity as New York State's, Onondaga County, Family Court People's Officer, willfully violated this Plaintiff/Plaintiff's biological children's, God given, inalienable, Civil and or Constitutional Rights?

Per The People's Record kept filed at New York State's, Onondaga County, Family Court, located at 401 Montgomery St Syracuse, NY 13202. Family File # 43339- Madore. On numerous occasions Salvatore Pavone Esq., while acting in his official capacity as New York State's, Onondaga County, Family Court, appointed attorney referee willfully violated this Plaintiff/Plaintiff's biological children's, God given, inalienable, Civil and Constitutional Rights.

What, God given, inalienable, Civil Rights and or Constitutional Rights belonging solely to this Plaintiff/Plaintiff's biological son's were willfully violated by Salvatore Pavone Esq., while he was acting in his official capacity as New York State's, Onondaga County, Family Court, appointed attorney referee?

Per The Constitution of THE UNITED STATES OF AMERICA. Per The People's Record kept filed at New York State's, Onondaga County Family Courthouse located at 401 Montgomery St Syracuse, NY 13202. Family File # 43339- Madore. The God given, inalienable, Civil Rights and or Constitutional Rights belonging solely to this Plaintiff/Plaintiffs biological son's, willfully violated by Salvatore Pavone Esq., while he was acting in his official capacity as New York State's, Onondaga County, Family Court, appointed attorney referee are those in writing belonging to this Plaintiff and natural born United States citizen Ryan David Madore born 02/15/1988, this plaintiff's biological sons ~~Mark Richard~~ ~~Mark~~ born ~~1988~~ and ~~George John~~ ~~John~~ ~~Mark~~ born ~~1988~~. In writing of the following AMENDMENTS.

AMENDMENT II. A well regulated militia, being necessary to the security of a free state, the right of the people to keep and bear arms, shall not be infringed.

AMENDMENT IV. The right of the people to be secure in their persons, houses, papers, and effects, against unreasonable searches and seizures, shall not be violated, and no warrants shall issue, but upon probable cause, supported by oath or affirmation and particularly describing the place to be searched, and the persons or things to be searched.

AMENDMENT V. No persons shall be deprived of life, liberty or property, without due process of law, nor shall private property be taken for public use, without just compensation.

AMENDMENT VI. In all criminal prosecutions, the accused shall enjoy the right to a speedy and public trial, by an impartial jury of the state and district wherin the crime shall have been committed, which district shall have been previously ascertained by law, and to be informed of the nature and cause of the accusation; to be confronted with the witnesses against him; to have compulsory process for obtaining witnesses in his favor, and to have the assistance of counsel for his defense.

AMENDMENT VII. In suits at common law, where the value in controversy shall exceed 20 dollars, the right of jury trial shall be preserved, and no fact tried by jury, shall be otherwise reexamined in any court of the United States, then according to the rules of common law.

AMENDMENT VIII Excessive bail shall not be required, nor excessive fines imposed, nor cruel and unusual punishment inflicted.

AMENDMENT IX. The enumeration of the Constitution, of certain rights, shall not be construed to deny or disparage others retained by the people.

AMENDMENT X. The powers not delegated to the United States by the Constitution, nor prohibited by it to the states, are reserved to the states respectively, or to the people.

AMENDMENT XIV. Section 1. All persons born or naturalized in the United States, and Subject to the jurisdiction therof, are citizens of the United states and of the state wherin they reside. No state shall make or enforce any law which shall abridge the privileges or immunities of citizens of the United States, nor shall any state deprive any person of life, liberty or property, without due process of law, nor deny to any person within its jurisdiction the equal protection of the laws.

When Chronologically were God given, inalienable Civil Rights and or Constitutional Rights belonging solely to this Plaintiff/Plaintiff's biological sons willfully violated by Salvatore Pavone Esq., while he was acting in his official capacity as New York State's, Onondaga County, Family Court, appointed attorney referee?

Per The Peoples Record kept and filed at the New York State's, Onondaga County Family Courthouse located at 401 Montgomery St Syracuse, NY 13202. Family file # 43339- Madore. God given, inalienable Civil Rights and Constitutional Rights belonging to this Plaintiff/Plaintiff's biological children were chronologically violated by New York State's, Onondaga County, Family Court, appointed attorney referee Salvatore Pavone Esq., while acting in his official capacity on the day.

11/23/2016 - Sole-Custody ordered by Salvatore Pavone Esq. in willfull violation of AMENDMENT V, AMENDMENT VI, AMENDMENT VIII, AMENDMENT IX, AMENDMENT X, AMENDMENT XIV Per (Felix O.V.Janette M., 30 Misc3d712(2008),

7/13/2023 - Order to Show Cause by Salvatore Pavone Esq., Judicial Intervention by Hon. Christina F. Dejoseph. Willfull violation of AMENDMENT V, AMENDMENT VI, AMENDMENT VIII, AMENDMENT IX, AMENDMENT XIV,

7/19/2023 - Summons Order by Salvatore Pavone Esq. in willfull violation of AMENDMENT V, AMENDMENT VI,

7/25/2023 - Dismissal Order by Salvatore Pavone Esq. in willfull violation of AMENDMENT V, AMENDMENT VI,

7/09/2023 - Letter and ex parte communication from Salvatore pavone Esq. instructing counsel to immediately write to the court and request to be relieved before October 13, 2023 at 9:00AM in willfull violation of AMENDMENT V, AMENDMENT VI, AMENDMENT IX, AMENDMENT XIV,

9/07/2023 - Emergency Order to Show Cause ordered by Salvatore Pavone Esq. that violated Parker Warning law and due process guaranteed to all natural born citizens by the Constitution of THE UNITED STATES OF AMERICA when full stay away order of protection was ordered and Plaintiff was not informed of proceedings and was not present to defend himself or biological children from unlawful and unconstitutional full stay away order of protection. After plaintiff filed violation petition with family court for respondent willfully violating court parenting schedule that was dismissed by Salvatore Pavone as moot. In willfull violation of AMENDMENT II, AMENDMENT V, AMENDMENT VI, AMENDMENT VIII, AMENDMENT IX AMENDMENT XIV,

9/12/2023 - Received amended petition for modification of custody and visitation in support of application for order to show cause with Salvatore Pavone Esq. presiding 9/20/2023 at 10:15AM. Violating AMENDMENT V, AMENDMENT IX, AMENDMENT XIV,

9/15/2023 - By unlawful order of Salvatore Pavone Esq., Onondaga County Sheriffs Department Deputies conducts unlawful and unconstitutional search and seizure of firearms at 122 Doll PKWY Syracuse, NY after first attempting to conduct unlawful and unconstitutional search and seizure of firearms at 7170 Franklong Rd Jamesville, NY 13078. Violating AMENDMENT II, AMENDMENT IV, AMENDMENT V, AMENDMENT VIII, AMENDMENT IX, AMENDMENT X, AMENDMENT XIV,

9/21/2023 - Continuation ordered for 12/1/2023 at 9:00AM, Ronnie White Jr. appointed counsel. Willful violation of AMENDMENT V, AMENDMENT VI, AMENDMENT VIX,

12/5/2023 - Order of Dismissal. Willful violation of AMENDMENT V, AMENDMENT VI, AMENDMENT XIV,

12/19/2023 - Hearing at 1:00PM. Willful violation by Salvatore Pavone Esq. and co conspirators at New York State's, Onondaga County, Family Court acting in official capacity of AMENDMENT V, AMENDMENT VI, AMENDMENT XIV,

1/29/2024 - Order on Motion. Willful violation by Salvatore Pavone Esq. and co conspirators at New York State's, Onondaga County, Family Court acting in official capacity of AMENDMENT V, AMENDMENT VI, AMENDMENT XIV,

2/28/2024 - Order On Motion. Willfull violation by Salvatore Pavone Esq. and co conspirators at New York State's, Onondaga County, Family Court acting in official capacity of AMENDMENT V, AMENDMENT VI, AMENDMENT XIV,

2/28/2024 - Order of Dismissal. Willfull violation by Salvatore Pavone Esq. and co conspirators at New York State's, Onondaga County, Family Court acting in official capacity of AMENDMENT V, AMENDMENT VI, AMENDMENT XIV,

2/28/2024 - Order of Dismissal. Willfull violation by Salvatore Pavone Esq. and co conspirators at New York State's, Onondaga County, Family Court acting in official capacity of AMENDMENT V, AMENDMENT VI, AMENDMENT XIV,

2/28/2024 - Order of fact finding and disposition. Willfull violation by Salvatore Pavone Esq. and co conspirators at New York State's, Onondaga County, Family Court, acting in official capacity of AMENDMENT V AMENDMENT VI, AMENDMENT XIV,

2/28/2024 - 2 year full stay away Order of protection by Default. Willful violation by Salvatore Pavone Esq. and co conspirators at New York State's, Onondaga County, Family Court, acting in official capacity of AMENDMENT V, AMENDMENT VI, AMENDMENT XIV ,

6/24/2024 - Order of Recusal. Willful violation by Salvatore Pavone Esq. and co- conspirators at New York State's, Onondaga County, Family Court, acting in offficial capacity of AMENDMENT V, AMEENDMENT VI, AMENDMENT XIV.

Where did the recorded willfull Civil Rights violations against this Plaintiff/Plaintiff's biological children by New York State's, Onondaga County, Family Court, appointed attorney referee Salvatore Pavone Esq. take place?

Per The People's record filed and kept by New York State's, Onondaga County, Family Court located at 401 Montgomery St Syracuse, NY 13202. The 18 recorded willfull Civil Rights violations against this Plaintiff/Plaintiff's biological children by New York State's, Onondaga County, Family Court, appointed referee Salvatore Pavone Esq., took place at New York State's, Onondaga County, Family Courthouse located at 401 Montgomery St Syracuse, NY 13202 from 11/26/2016 to the present day.

How did New York State's, Onondaga County, Family Court, appointed attorney referee Salvatore Pavone Esq. and co conspirattors violate God given, inalienable, civil rights and or constitutional rights belonging solely to this Plaintiff/Plaintiff's biological children?

New York State's, Onondaga County, Family Court, appointed attorney referee Salvatore Pavone Esq. and co conspirators violated God given, inalienable, civil rights and or constitutional rights belonging solely to this Plaintiff/Plaintiff's biological children per family file # 43339 - Madore, by purposefully not recusing himself and by all officers willfully violating sworn Attorney Oath of Office November 2016 to June 2024. When petitions containing written allegations against court officers acting in their official capacity were lawfully received numerous times by New York State's, Onondaga County, Family Court, Court Clerks office detailing facts of violations willfully made by Officers of its own New York State's, Onondaga County, Family Court. Detailing facts of The Constitution of THE UNITED STATES OF AMERICA that support this Plaintiff's claim to a God given right to immediate emergency Federal judicial relief. Detailing facts of Mckinney's New York Constitution that support this Plaintiff's claim to a God given right to immediate emergency Federal Relief. Detailing facts of written law supporting this Plaintiff's claim to a God given right to immediate emergency judicial relief. Detailing facts of the right of fathers who demand emergency judcicial relief be ordered and provided to this Plaintiff/Plaintiff's biological children immediately.

Per the numerous times on record this Plaintiff lawfully petitioned for Emergency Judicial Relief to New York State's, Onondaga County, Family Court and was repeatedly violated by the very officers being alleged to have committed willful violations against this Plaintiff's biological children while acting in their official capacity as a result instead. On the following days it had been brought to the full attention of the following officers of New York State's, Onondaga County, Family Court that due process and this Plaintiff's rights were willfully being violated by Salvatore Pavone Esq., while acting in his official capacity as New York State's, Onondaga County, Family Court, appointed attorney referee.

11/23/2016 - Having first been denied legal counsel from Sherene Pavone Esq., wife of Salvatore Pavone Esq., due to a conflict of interest discovered by Sherene Pavone Esq., during telephone conference call with this Plaintiff, unlawful proceedings took place in willful violation of due process at New York State's, Onondaga County, Family Courthouse 401 Montgomery St Syracuse, NY 13202. Per record of proceedings this Plaintiff was referred to "a bulldog lawyer named Sherene", by a trusted whole heartedly Veteran UNITED STATES MARINE, before any and all proceedings or orders were written in violation of due process for Sole Custody and Visitation by her husband Salvatore Pavone Esq., while acting in his official capacity as New York State's, Onondaga County, Family Court, appointed attorney referee. Orders written by Salvatore Pavone Esq. that unlawfully stripped this Plaintiff and Plaintiff's biological son of inalienable God given Father/Son rights in blatant willfull violation of due process. As it was confessed prior to any and all proceedings to a "bulldog named Sherene", by this Plaintiff that a cruel man named Salvatore Pavone was the court appointed attorney referee scheduled to hear this Plaintiff's case per Family File # 43339 - Madore, who then confessed to this Plaintiff, made completely surprised and horrified that Salvatore Pavone Esq was her husband and it would be a conflict of interest for her to take my case and represent me at upcoming proceedings. Before unlawful proceedings then took place and Salvatore Pavone Esq. did not recuse himself prior to proceedings but instead stripped this Plaintiff of his only son given to him by The Almighty. At the standing objection of Honorable William Barrett (R.I.P.), New York State's, Onondaga County, Family Court, appointed attorney for child ~~Mark Richard Madore~~, born ~~2000~~. As Honorable William Barrett was made aware prior to custody proceedings of the conflicts presented in his client's case. Per The People's record of family file # 43339 - Madore, immediately prior to the start of custody proceedings when New York State's, Onondaga County, Family Court, appointed attorney Mark Schaeber Esq., motioned to be relieved by New York State's, Onondaga County, Family Court, appointed attorney referee Salvatore Pavone Esq. and was relieved. Custody Proceedings then unlawfully taking place at Salvatore Pavone's Esq. direction before plaintiff was appointed counsel to defend God given inalienable rights. Unlawful proceedings held by Salvatore Pavone Esq. to punish this Plaintiff in the most cruel and unusual way. Unlawful Proceedings held by Salvatore Pavone Esq. before this Plaintiff could speak on record that the reason appointed attorney/client privilege broke down was because during introductory phone call made by this Plaintiff to appointed Attorney Schaeber in desperate attempt to be reunited with biological infant son who was deposed lawfully in petition notarized and received by Family Court of being 100% alienated at the time from father/Plaintiff by his mother, Mark Schaeber Esq., advised this Plaintiff, "Next time get a hooker."

The unlawful custody proceedings 11/23/2016 that resulted in written Order of Sole Custody

and Visitation by Salvatore Pavone Esq. on its face serves The People and this Plaintiff as physical evidence of blatant civil rights and constitutional rights violations having been committed against this Plaintiff and Plaintiff's biological children by New York State's, Onondaga County, Family Court officers while acting in their official capacity.

12/11/2023 - Received by Onondaga County Family Court at 2:59PM. Notarized Affadavit in Support of Petition for Custody filed by this Plaintiff and natural born citizen of The United States of America. Page 1 of 19, 1 Citing the demand for Jury relief provided by United States citizens and People of New York State Family Court. Page 7 of 19, 14. citing the fact July 13, 2023, per Order to Show Cause In Person regarding file # 43339, docket # v-06767-13/23G, Judicial Intervention took place by Honorable Christina F. Dejoseph, by her use of a pen to cross out and stop proposed orders by Salvatore Pavone Esq. to suspend this male Plaintiff's parenting time with 11 year old biological son. Page 12 of 19, 24. Citing the fact September 7, 2023, per Emergency Order to Show Cause/Motion1 regarding file # 43339 filed by respondent, received by New York State's, Onondaga County, Family Court and processed by Chief Clerk David Primo. Salvatore Pavone Esq., while acting in his officially capacity willfully violated AMENDMENT II, AMENDMENT V, AMENDMENT VI, AMENDMENT VIII, AMENDMENT IX, AMENDMENT XIV when ordering full stay away order of protection, keeping this Plaintiff from having contact with this Plaintiff's biological adolescent son. After proceedings by Salvatore Pavone Esq., and co- conspiring New York State, Onondaga County, Family Court officers took place at a hearing held at 401 Montgomery St Syracuse, NY 13202 by New York State's, Onondaga County, Family Court that this Plaintiff was NOT present with representation to defend himself or biological son.

03/21/2024 - Received by Onondaga County Family Court at 3:38 PM. Notarized Affadavit in Support of Enforcement of Order of Visitation File by Family Court file # 43339 filed by this Plaintiff and natural born citizen of The United States of America. Page 2 of 6, 7. Citing the fact Respondents are guilty of violating court orders for custody and visitation every Wednesday, every other Friday, Saturday and Sunday since July 2023 that grant this Plaintiff, this Plaintiff's biological son and extended family a loving relationship. Warranting family offense petition. Page 2 of 6, 9. Citing The respondent threatened this petitioner by paying lawyer Joseph Morawski to make frivolous statements about this petitioner which resulted in respondent being granted an unwarranted and unconstitutional temporary order of protectionon by Onondaga County Family Court appointed attorney referee Salvatore Pavone. The same court appointed attorney referee that continues to violate this petitioners civil rights after breaking the parker warning law. The law that makes it unconstitutional for a trial or hearing to take place against a defendant who is not protected per The Constitution of THE UNITED STATES OF AMERICA by legal counsel at the time of trial or hearing. In his official capacity, on record and against the standing objection of child attorney Honorable William Barrett, Onondaga County Family Court appointed attorney referee Salvatore Pavone stripped this petitioner of his god given inalienable rights when this petitioner was not protcted by counsel.

Record will prove that July 13, 2023 Judicial intervention was necessary by Onondaga County Family Court Honorable Judge Christina F. Dejoseph on an Order to Show Cause in Person

when Onondaga County Family Court dishonorable court appointed attorney referee Salvatore Pavone proposed an order to suspend this petitioners parenting time, pending further order by this court. Presently after dismissing this petitioners multiple petitions demanding relief and this respondents petition to modify custody dishonorable court appointed attorney referee Salvatore Pavone took it upon himself and ordered the unwarranted and unconstitutional temp order by default that forces by threat of incarceration this petitioner to stay away from his biological son ~~Malcom Richard Morowski~~. Article 78 proceedings against Salvatore Pavone Esq. and Pavone Associates LLC will prove these allegations to be nothing but the truth. Page 3 of 6, 10 Citing There is a court case pending between this petitioner and respondent as result of this petitioner filing an Emergency Order To Show Cause February 26, 2024 at 3:15PM by default as seen on Onondaga County Courthouse recorded video. Salvatore Pavone buried it though to avoid being held accountable for his actions so this petitioner was told by Onondaga County Family Court clerks office to file another petition. Hence this petition. Page 4 of 6, A. Assign counsel to this petitioner. As was requested with petition filed by default February 26, 2024 @ 3:15 PM by this petitioner per Courthouse CCTV. Before Salvatore Pavone attempted to bury this adoring fathers case February 28,2024 at the hearing where this petitioner was recorded being assaulted and physically removed from his ownhearing before dishonorable Salvatore Pavone. The same hearing where this petitioners efforts the past 9 months were dismissed by default and when a temporary unwarranted unconstitutional order of protection was extended 2 years by Pavone out of spite. Page 4 of 6, C. Assign Honorable Christina F. DeJoseph to Onondaga county Family Court family file # 43339 please. Records prove Judge Cerio has discriminated against this petitioner already and therefore is also unfit to serve this petitioner. Page 4 of 6, D. Schedule a summons for the Emergency order to Show Cause filed in person with Onondaga County Family Courts Deputy Chief Clerk by this petitioner February 26, 2024 @ 3:15PM to be heard before temmp orders signed by dishonorable attorney referee Salvatore Pavone while he was abusing his position and authority by violating this petitioners civil rights become permanent for 2 years by default March 28, 2024. Page 5 of 6, E. Dismiss the unwarranted and unconstitutional temp orders signed by dishonorable attorney referee when he was abusing his position and authority. Dismiss the petitions respondent Nicole Russell filed after paying attorney Joseph Morowski to file petitions containing frivolous allegations against this petitioner in direct response to this petitioner filing a petition requesting relief July10, 2023 after ~~Malcom Richard Morowski~~ had been kidnapped and unlawfully imprisoned by Nicole Russell and Chad Russell.

03/21/2024 - Letter from David Primo, Chief Clerk, Onondaga County Family Court that reads.

March 21,2024

Ryan Madore

5100 Highbridge St., Apt 30B

Fayetteville NY 13066

Re: Request for recording/transcript

Dear Mr. Madore,

It is my understanding that you recently appeared at the public counter in Onondaga County Family Court, seeking information regarding papers which you presented to this court just prior to your Feb. 28th appearance. Your court papers represented your request to obtain a copy of recordings which are made as a record of each proceeding held before Court Attorney Referee Pavone.

Apparently at the time of the last court appearance you were removed from the courtroom at the direction of the court attorney referee. The court may have treated your request for transcript as moot, particularly since you were not present or available to address your request with the court. Regardless, I'm enclosing a form which allows you to procure a transcript of testimony for any day or date which you would like.

This court does not make recordings available to litigants or attorneys, and will not reduce the recording to a cd or digitized method. The court does allow you to have a transcript of the proceedings created and prepared by a certified stenographic reporter who will affirm the completeness and accuracy of the written transcript prepared from the actual court recording. Toward that end, I'm enclosing the form and instructions for you to use in ordering whatever proceeding or portion of a proceeding that you would like. This will be done at your cost and expense. In the event it is prepared for the purpose of Appeal, I'm also enclosing instructions that would allow you to apply for poor person status through the appellate division if you are unable to afford having the transcript prepared. The forms are enclosed for your ready reference and use.

very truly yours,

David M. Primo, Esq.

04/25/2024 - Received by Onondaga County Family Court 10:14AM. Notarized letter from this Plaintiff to Honorable Deborah H. Karalunas, 5th Judicial Administrative Judge. Page 1 of 11, Public record of proceedings held at New York State's, Onondaga County, Family Courthouse with family file number 43339 show recent petitions dismissed and recent orders

made long standing by default. On record in the year 2016 during a hearing Onondaga County Family Court appointed attorney referee Salvatore Pavone stripped me of custody of my son after the court appointed attorney assigned to represent me in my visitation/custody case relieved himself minutes prior to proceedings and I was not afforded protection of any legal counsel. Testimony from then court appointed attorney would confirm over the telephone when I was calling to schedule an introductory meeting regarding my visitation and custody petition the attorney assigned to represent me advised me "next time just get a hooker". As do public records kept by Onondaga County Sheriffs Department. Page 9 of 11 accidentally numbered 8, McKinneys CPLR Rule 5015 states that upon showing that default judgements were made in violation of the law an administrative judge may bring a proceeding to relieve a party as may be just. On stipulation would be a conflict of interest since allegations have been made regarding the obstruction of justice by County Clerk David Primo as well. I motioned for relief too already but Judge Cerio violated my civil rights at the hearing by not providing appropriate counsel and then forcing testimony in violation of the constitution before dismissing my case. Per 42 U.S.C.A. 1983, although Public officers qualified immunity safeguards them from being held liable for civil rights violations it does not safeguard them from committing crimes such as obstruction of justice. United States V. Grunewald.233 F 2d 556.571(2d Cir 1956) rev'd, 353 U.S. 391 (1957), United States V. Barrfield, 999 F.2d 1520. 1524 ( 11th Cir.1993), United States V. Ryan, 455 F.2d 728 734 99th Cir.1972).....

On record it has been 4 months since I demanded a trial by jury and still have not been summoned for a hearing or pre trial regarding a jury trial.

On record it has been 10 months since I petitioned for enforcement of court orders and was ordered unconstitutionally to stay away from my biological child.

I now request that the Honorable Administrative Judge of this court take notice of a motion to reject referees default orders and initiate article 78 proceedings against the criminals all evidence derived from NYS Onondaga County Family Court public record, and this letter, a cry for help from a father and lifetime Patriot of The UNITED STATES OF AMERICA warrants. Per the Constitution of THE UNITED STATES OF AMERICA. Per McKinney's New York State Constitution.

Respectfully your honor, once again.

6/24/2024 - Order Of Recusal signed by Salvatore Pavone Esq. File # 43339 Docket # V-06767-13/24M,V-03557-24

8/12/2024 - Received By Onondaga County Family Court at 2:05PM. Notice of Motion for Emergency Judicial Relief file # 43339 Docket # V-06767-13/24M,V-03557-24, Motion #1 filed by this Plaintiff and natural born citizen of The United States of America. Page 1, Who-Court Officers of NYS Onondaga County Family Court. What- Violated due process of

The Constitution of THE UNITED STATES OF AMERICA and McKinneys New York Constitution by proceeding in family court when petitioner was not protected by legal counsel. Why- Retaliatiion for this petitioner filing a petition with NY Onondaga County Family Court alleging numerour civil rights violations by multiple New York State Familiy Court Officers. Including bing denied the right to counsel and include being denied the right to a trial by jury. Where- Onondaga County Courthouse, 401 Montgomery St Syracuse, NY 13202, Floor 3, Room 312. When- July 30,2024, at approximately 9:30AM. How- Upon hearing a motion to dismiss in violation of due process, The constitution of THE UNITED STATES OF AMERICA, Mckinney's NY Constitution, Honorable Christina F. DeJoseph granted attorney Joseph Morawski dismissal as it pertains to this petitioners biological child ~~Grayson~~ ~~Jake~~ ~~Madore~~, citizen of the United States and biological brother to ~~Michael~~ ~~Ryan~~ ~~Madore~~. Not before both Officers first wintessed for themselves objection made by myself Graysons Father. Before he was ever assigned and protected by counsel as guaranteed by law. Page 2, On record Judge DeJoseph confessed to having not read this petitioners affadavit opposing Motion to Dismiss received by Onondaga County Family Court prior to all legal proceedings when objection to respondents, attorney Joseph P. Morawski Esq. frivolous Motion to Dismiss that he himself knows to be a clear and blatant violation of the Oath of Office he took to uphold The Constitution of THE UNITED STATES OF AMERICA and Mckinney's NY Constitution was made by myself the petitioner.

9/16/2024 - Filed and Entered 9/16/2024 by Onondaga County Family Court. Order on Motion, File # 43339, Docket # V-06767-13/24M(Motion 2) dated 8/30/2024 Ordered by New York state's, Onondaga County, Family Court, Judge Christina F. DeJoseph that the Notice of Motion For Emergency Judicial Relief of Ryan Madore filed 8/12/2024 is denied with prejudice.

9/16/2024 - Filed and Entered 9/16/2024 by Onondaga County Family Court. Order of Dismissal, File # 43339, Docket # V-06767-13/24M. Ordered by New York State's, Onondaga County, Family Court, Judge Christina F. DeJoseph. On June 17, 2024 Ryan Madore filed a petition for violation of order of custody and violation order of visitation regarding a prior order dated November 16, 2016. Now, therefore,upon the Courts own motion it is hereby: Ordered that the petition against respondent is dismissed to to failure to state a cause of action.

9/25/2024 - Filed and Entered 9/25/2024 by Onondaga County Family Court. Order of Dismissal, family offense, file # 43339, Docket # O-05577-24. Ordered by New York State's, Onondaga County, Family Court, Judge Joseph J. Zavaglia. On September 23, 2024 Ryan Madore filed a petition for order of protection. The Court finds that aftfer reviewing the family offense and relatinoship allegations in the petition it is hereby ordered that the petition is dismissed for the following reason: failure to state a cause of action.

10/7/2024 - Filed and Entered 10/7/2024 by Onondaga County Family Court. Order of Dismissal, File # 43339, Docket # V-06767-13/24N, V-06767-13/24O. Ordered by New York State's, Onondaga County, Family Court, Judge Joseph J. Zavaglia. On September 23, 2024 Ryan Madore filed a petition for modification of order of visitation, modification of order of

custody, violation of order of custody, and violation of order of visitation regarding a prior order dated November 16, 2016. Now, after examination and inquiry into the facts and circumstances of the case it is hereby Ordered that the petitions against Nicole Russell herein are dismissed without prejudice.

Per 18 U.S.C.A. sub section 3571. Sentence of fine. In general a defendant who has been found guilty of an offense may be sentenced to pay a fine. For an individual who has been found guilty of committing a Felony offense a fine not more than \$250,000.00 For an Organization who has been found guilty of committing a Felony offense a fine not more than \$500,000.00. Having willfully committed 18 violations against this Plaintiff/Plaintiff's biological children on the days deposed in this writ, constituting 18 Felony Offense's willfully committed by New York State's, Onondaga County, Family Court, appointed attorney referee Salvatore Pavone Esq., and co - conspirators while acting in official capacity, this writ serving the record as physical evidence of willful Felony offense committed against children by The People's Officers while they were acting in official capacity. This plaintiff, a natural born citizen of THE UNITED STATES OF AMERICA by God, on behalf of this plaintiff's biological children ~~Mark Richard Manno~~, born ~~01/01/2001~~ and ~~Grayson John Manno~~, born ~~01/01/2009~~ demands violators be ordered incarcerated for the maximum number of years and minimum payment of \$9,000,000.00 ordered to be made to child victims of crimes willfully committed by New York State's, Onondaga County, Family Court, appointed attorney referee Salvatore Pavone Esq., and co - conspirators. With sentence and fine ordered immediately upon conclusion of the lawful proceedings warranted and ordered by this ignorant Plaintiff's petition to United States of America Federal Supreme Court requesting immediate emergency judicial relief. Through the service of accusatory instrument received by Salvatore Pavone Esq., 12/24/2024 at 1:13PM by United States Postal Service. Deposed lawfully by this Plaintiff on behalf of this plaintiff/plaintiff's biological adolescent children, who by unlawful, cruel and unusual orders of Salvatore Pavone Esq., have been violated 3,300 days and counting. To lawfully serve the justice guaranteed to all natural born citizens by The Constitution of THE UNITED STATES OF AMERICA. By God.

5.

### CAUSES OF ACTION

Note: You must clearly state each cause of action you assert in this lawsuit.

#### FIRST CAUSE OF ACTION

God given, Father/Son, human rights, Civil rights presently being denied were discovered by this Father to have been violated 11/23/16. Per New York State's, Onondaga County, Family Court, Family File # 43339- Madore.

#### SECOND CAUSE OF ACTION

It is the right of a God Fearing man, Father, Natural born Citizen of the United States of America. Guaranteed by THE CONSTITUTION of THE UNITED STATES OF AMERICA. To honor and defend.

#### THIRD CAUSE OF ACTION

The People's record proves Since discovery was made this plaintiff has proceeded lawfully only to be denied and violated by New York State's, Family Court, Officers. The People's Officers. Who willfully commit Felony offense against Children while acting in their official Capacity. Warranting Penalty and Fine. 11/23/16, each offense, to the present day.

6. PRAYER FOR RELIEF

WHEREFORE, plaintiff(s) request(s) that this Court grant the following relief:

Restore Father/Son, God given, inalienable rights.

Return biological Children being unlawfully alienated.

Using RICO order hearing, Convict guilty individuals  
groups, associations, corporations. Impose punishment  
of Fine and imprisonment by Court Order please.

End the Nightmare.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 01/17/2025

Ryan Madore  
Ryan Madore

Signature of Plaintiff(s)  
(all Plaintiffs must sign)

**CERTIFICATE OF SERVICE BY MAIL**

State of New York

SS:

County of Onondaga

I, Ryan David Madore, hereby certify that I am the plaintiff herein and

served a copy of the following document(s):

United States District Court for the Northern District of New York

Civilian Pro Se Forms - Packet Civil Rights Complaint

(Specify document(s))

on Salvatore A. Pavone, Esq. (Name of person/Addresssee)

at: 401 Montgomery St. (Address to which document(s)

Syracuse, New York 13202 were sent)

by mailing and depositing a true and correct copy of said document(s) in a mailbox located

at: Fayetteville Post Office 599 East Genesee St. Fayetteville, NY 13066

on the following date: 01/21/25

I certify that the foregoing is true and correct.

DATED: 01/21/25

  
Signature of Plaintiff

FORM I (2)

**CERTIFICATE OF SERVICE BY MAIL**

State of New York :

SS:

County of Onondaga :

I, Ryan David Madore, hereby certify that I am the plaintiff herein and

served a copy of the following document(s):

United States District Court for the Northern District of New York  
Civilian Pro Se Forms Packet Civil Rights Complaint  
(Specify document(s))

on David M. Primo, Esq. (Name of person/Addresssee)

at: 401 Montgomery St. (Address to which document(s)

Syracuse, New York 13202 were sent)

by mailing and depositing a true and correct copy of said document(s) in a mailbox located

at: Fayetteville Post office 599 East Genesee St. Fayetteville, NY 13066

on the following date: 01/21/25

I certify that the foregoing is true and correct.

DATED: 01/21/25

Ryan Madore  
Signature of Plaintiff

**CERTIFICATE OF SERVICE BY MAIL**

State of New York

SS:

County of Onondaga

I, Ryan David Madore, hereby certify that I am the plaintiff herein and

served a copy of the following document(s):

United States District Court for the Northern District of New York  
Civil Rights Complaint  
Civilian Pro Se Forms Packet (Specify document(s))

on Hon. Christina F. De Joseph (Name of person/Addressee)

at: 401 Montgomery St. (Address to which document(s)

Syracuse New York 13202 were sent)

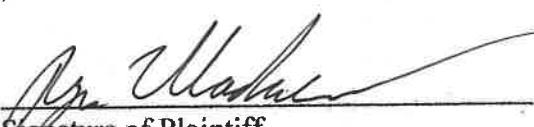
by mailing and depositing a true and correct copy of said document(s) in a mailbox located

at: Fayetteville Post Office 599 East Genesee St. Fayetteville NY 13064

on the following date: 01/21/25

I certify that the foregoing is true and correct.

DATED: 01/21/25

  
Signature of Plaintiff

FORM I (2)

## AFFIDAVIT OF SERVICE BY MAIL

State of New York :  
 County of Onondaga :

I, Ryan David Madore, being duly sworn, deposes and says: that I am the plaintiff herein and served a copy of the following document(s):  
United States District Court for the Northern District of New York  
Civilian Pro - Se Forms Packet (Specify document(s))  
Civil Rights Complaint  
 on David M. Primo, Esq. (Name of person/Addressee)  
 at: 401 Montgomery St. (Address to which document(s)  
Syracuse, New York 13202 were sent)

by mailing and depositing a true and correct copy of said document(s) in a mailbox located  
 at: Fayetteville Post Office 599 East Genesee St. Fayetteville, NY 13066  
 on the following date: 01/21/25.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 01/21/25

  
 Signature of Plaintiff

Sworn to before me this 21<sup>st</sup> day of January, 2025.

  
 Erik Bernstein  
 Notary Public

ERIK BERNSTEIN
NOTARY PUBLIC, STATE OF NEW YORK
Registration Number # 01BE6377661
Qualified in Onondaga County
Commission Expires Aug. 15, 2026

FORM I (1)

**AFFIDAVIT OF SERVICE BY MAIL**

State of New York :

SS:

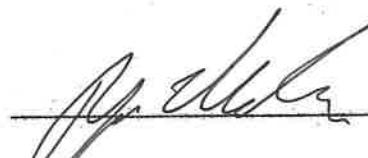
County of Onondaga :

I, Ryan David Madore, being duly sworn, deposes and says: that I am the plaintiff herein and served a copy of the following document(s):  
United States District Court for the Northern District of New York  
Civilian Pro Se Forms Packet (Specify document(s))  
Civil Rights Complaint  
on Salvatore A. Pavone, Esq. (Name of person/Addressee)  
at: 401 Montgomery St. (Address to which document(s)  
Syracuse, New York 13202 were sent)

by mailing and depositing a true and correct copy of said document(s) in a mailbox located  
at: Fayetteville Post Office 599 East Genesee St. Fayetteville, NY 13066  
on the following date: 01/21/25.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 01/21/25



Signature of Plaintiff

Sworn to before me this 21<sup>st</sup> day of January, 2025.



Notary Public

ERIK BERNSTEIN
NOTARY PUBLIC, STATE OF NEW YORK
Registration Number # 01BE6377661
Qualified in Onondaga County
Commission Expires Aug. 15, 2026

FORM I (1)

## AFFIDAVIT OF SERVICE BY MAIL

State of New York :  
 County of Onondaga :  
 SS:

I, Ryan David Madore, being duly sworn, deposes and says: that I am the

plaintiff herein and served a copy of the following document(s):  
United States District Court for the Northern District of New York  
Civilian Pro Se Forms Pac Ref Civil Rights Complaint  
 (Specify document(s))

on Hon. Christina F. DeJoseph (Name of person/Addressee)  
 at: 401 Montgomery St. (Address to which document(s)  
Syracuse, New York 13202 were sent)

by mailing and depositing a true and correct copy of said document(s) in a mailbox located

at: Fayetteville Post Office 599 East Genesee St. Fayetteville, NY 13064  
 on the following date: 01/21/25.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 01/21/25

  
 Signature of Plaintiff

Sworn to before me this 21<sup>st</sup> day of January, 2025.

  
 Notary Public

ERIK BERNSTEIN
NOTARY PUBLIC, STATE OF NEW YORK
Registration Number # 01BE6377661
Qualified in Onondaga County
Commission Expires Aug. 15, 2026

FORM I (1)